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Tab 1 – Service Area Maps of Kansas and Oklahoma.

Tab 2 - ExParte Outline:

- Overview:
 - Density – 4 lines per square mile.
 - Basic service costs - \$120/line/month.
 - Advanced service costs – Additional \$50 to \$60/line/month.
 - Access facilities used by IXC's, CLEC's, Wireless, etc.
- Major sources of revenue:
 - Network access – 49% or \$60/line/month.
 - Universal service funds – 34% or \$40/line/month.
- Access revenues at risk due to:
 - Potential adoption of bill-and-keep; wireless traffic is not balanced in rural ILEC areas and thus bill-and-keep is inappropriate.
 - Arbitrage of access rates – inappropriate expansion of local calling area via MTA and Virtual NPA-NXX.
 - Potential misapplication of ESP/ISP exemption (VOIP) which would allow arbitrage of access rates.
 - Application of lawfully approved access tariffs must be enforced.
- Universal service revenues at risk:
 - Insufficient public interest test for additional ETC's.
 - Asymmetric ETC criteria for Wireless ETC's.
 - A number of wireless carriers currently serve rural areas without support.
- Broadband:
 - Rural ILECs at the forefront of providing affordable service (approx. \$30/month).
 - Affordable rates only possible due to regulatory mechanisms (USF's and NECA pool) that support high rural costs.
 - The support mechanisms would be lost if rural broadband services were deregulated.

Tab 3 – Phone-to-Phone VOIP traffic simply uses IP facilities as the means of transport.
This traffic is still subject to originating and terminating access charges.

Tab 4 - Wireless traffic is a significant and growing portion of rural ILEC terminating traffic. There is a significant imbalance in traffic terminated. Consequently, bill-and-keep for wireless traffic is inappropriate.

Tab 5 – The Act’s requirements are clear and require that equal access be added to the list of supported services.

Tab 6 - Public interest issues that must be analyzed when considering if an additional ETC should be designated in rural LEC service areas.

Tab 7 - Wireless Carriers serving ILEC rural areas.